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BY ECF

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Natifah Cooper v. City of New York, et al.*, 14 CV 6136 (PKC) (RLM)
Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent the defendants in the above-referenced matter. I write pursuant to the Court's September 15, 2015 Order to provide the Court with a joint status letter regarding this matter and to request a brief two week extension to complete discovery. Plaintiff consents to this request.

Discovery is largely complete in this matter with a few relatively minor issues to resolve. Defendants still have to provide plaintiff with one of the defendant officer's disciplinary history. Defendants will provide the history on October 8, 2015 prior to the defendant's deposition. The parties have scheduled all of the party depositions. Given counsel's schedule and the availability of the plaintiff, however, the parties need to schedule plaintiff's deposition during the week of October 12, 2015. In addition, the parties also have one non-party deposition outstanding, which the parties anticipate completing during the week of October 12, 2015.

Accordingly, the parties request a slight modification of the current discovery schedule. The parties proposed that discovery be completed by October 23, 2015 and that any requests for a pre-motion conference, if any, are to be completed by October 30, 2015.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Pernell Telfort

Pernell M. Telfort

cc: **BY ECF**
Robert Marinelli, Esq.
Attorneys for Plaintiff